

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION

AMBER BIZIKO, §  
§  
§  
Plaintiff, § CIVIL ACTION NO: 1:16-cv-111  
vs. §  
§  
STEVEN VAN HORNE, §  
MICHELLE N. VAN HORNE, §  
A HABITAT FOR LEARNING, and §  
LOVING INDIVIDUALS GENERATING §  
HEALING TODAY §  
§  
Defendants. §

**PLAINTIFF'S MOTION FOR ATTORNEY'S FEES**

Come now the Plaintiff, Amber Biziko, by and through the undersigned counsel, and, pursuant 29 USC § 216(b) and Local Rule 54-1, respectfully moves the Court for an award of Plaintiff's Counsel's reasonable attorney's fees in this cause, and in support of this petition would show the Court as follows:

1. On December 2, 2019, after a one (1) day jury proceeding, a verdict was returned in favor of the Plaintiff in the amount of \$838.00. [D.E. 114 & 115].
2. In support of her Petition for Attorney's Fees and Expenses, Plaintiff relies upon the contemporaneously filed Declaration of James M. Loren submitted with exhibits reflecting legal fees and expenses incurred through December 3, 2019. Plaintiff further relies upon the Memorandum of Law in Support of Plaintiff's Motion for Attorney's Fees and Costs filed contemporaneously herewith.
3. Plaintiff is requesting an award of her lodestar-based attorney's fees in the total

sum of Ninety-Three Thousand Eight Hundred Ninety and 50/100 Dollars (\$93,890.50). This sum represents fees for the following legal work and corresponding charges:

James M. Loren	68.5 hours @ \$400/hr.	\$ 27,400.00
Rachael Rustmann	219.7 hours @ \$300/hr.	\$ 65,910.00
Stephanie Holcomb	4 hours @ \$135/hr.	\$ 540.00
Janet Valdes	.2 hours @ \$135/hr.	\$ 27.00
Carlos Fernandez	.1 hour @ \$135/hr.	\$ 13.50
<b>TOTAL ATTORNEY'S FEES</b>	<b>292.5 hours</b>	<b>\$ 93,890.50</b>

4. Plaintiff would respectfully propose that the Court deem Ninety-Three Thousand Eight Hundred Ninety and 50/100 Dollars (\$93,890.50) as the lodestar figure and award an additional Seven Thousand Fifty-Three and 58/100 Dollars (\$7,053.58) in costs in this cause.

5. Plaintiff is filing her separate Bill of Costs contemporaneously with her Motion for Fees

WHEREFORE, Plaintiff respectfully requests that the Court award her attorney's fees in the amount of Ninety-Three Thousand Eight Hundred Ninety and 50/100 Dollars (\$93,890.50) costs in the amount of Seven Thousand Fifty-Three and 58/100 Dollars (\$7,053.58), and for all other just and appropriate relief that this Court deems she is entitled to.

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Respectfully submitted,

**GOLDBERG & LOREN, PA**

By: /s/ James M. Loren, Esq.

**James M. Loren**

**Attorney-in-charge**

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed on December 12, 2019 with the Clerk of Court using CM/ECF along with having served all counsel of record or pro se parties identified on the service list incorporated herein in the manner specified, either via transmission of Electronic filing generated by CM/ECF or in some other authorized manner for those counsel or parties not authorized to receive electronically Notice of Electronic Filing.

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